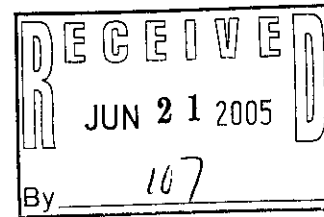




Manufacturers Bank & Trust Company

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June 13, 2005

Robert E. Feldman, Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: Docket Number OP-1227

Dear Mr. Feldman:

I have reviewed the Interagency Proposal on the Classification of Credit Exposures. In my opinion, this proposal, if implemented, would cause the banking system to incur much time and expense that will result in little, if any value.

Manufacturers Bank and Trust Company is a \$215 million bank with over \$150 million in loans. My responsibility as senior lender has become more complex over the years due to the increased regulatory burden. While there are issues that develop over time that create a need to change things in the system, this proposed change will create additional cost and complexity without achieving a better system than is now in place.

In my opinion, the time and cost to implement this proposed commercial loan classification program will result in no additional benefit to the regulators or the banks. I would appreciate your consideration to refrain from implementing this proposal.

Sincerely,

Richard M Fischer
Senior Vice President
RMF/rjh

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